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March 12, 2008

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch:

I am the Chairman of the Community Station Board for WCVE-FM (Richmond, Virginia), WCNV-FM (Heathsville, Virginia) and WMVE (Chase City, Virginia). I write to express concern about some of the proposed new regulatory requirements pertaining to the Commission's localism initiative.

The Community Station Board (CSB) is an advisory board comprised of citizens in the areas served by the three stations. The CSB provides input to Commonwealth Public Broadcasting—the nonprofit licensee governed by a local board of directors—on programming and public service opportunities. Meetings of both the Corporation for Public Broadcasting and the CSB are open to the public. Meeting times and dates are announced on the air so that listeners may participate if they choose. Our stations also solicit comments from individual listeners via the internet, the mail, by a dedicated telephone line, and during fundraising campaigns.

In addition to programming obtained from National Public Radio, our stations provide station-produced local and regional news; arts, culture, and local sports reporting; candidate interviews during elections; and in-depth reporting during the legislative session. We also broadcast speeches to organizations such as the local World Affairs Council and broadcast of notable community music events, such as performances by our local symphony orchestra, recitals from regional classical music festivals, and, during its time in Richmond, the National Folk Festival.

In addition to our traditional broadcasting, our stations offer internet streaming, which expands our listener base to those without radio receivers or with unsatisfactory radio reception.

Two of our stations WCNV (Heathsville) and WMVE (Chase City), are full-time repeater stations in rural areas. The installation of these two repeater stations in 2007 has allowed Ms.

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listeners in this region new or enhanced access to public radio and the news, arts, and cultural programming not previously available in these more remote parts of Virginia.

We maintain a presence in both of these newly served communities. We have reporters on staff at both locations. We have CSB members from within these stations' listening areas. We regularly offer weather, school closing, and other public service information to these regions. We provide local news stories and human interest commentary about the area. We are working to expand the number of localities in these listening areas who use our stations to provide emergency notifications to area residents. Staff members from WCVB have made numerous visits to these areas to meet with local government officials, school personnel, and community leaders.

The proposed regulation to require all stations—including repeaters—to have a main studio located within the city of license and station staffing whenever it is on the air would place unsurmountable economic burdens on the repeater stations and almost certainly require their closure.

Public radio offers cultural programming and public interest insight not readily available in all areas of Virginia. To be unable to continue this valuable service because of the proposed studio and staffing requirements would be most unfortunate. Importantly, this result would impede rather than promote the Commission's desire to enhance station responsiveness. We believe that the efforts we make to develop and maintain strong, interactive relationships are and will be more productive than studio and station staffing requirements.

I encourage the Commission to reconsider the studio and staffing requirements for repeater stations and to exempt public radio stations from these proposed regulatory requirements.

Thank you for your consideration.

Very truly yours,

Cynthia V. Bailey